

RE: MARCUS K GRAVES

) Case No. 19 B 25299
)
Debtor) Chapter 13
)
) Judge: DONALD R CASSLING

NOTICE OF MOTION

MARCUS K GRAVES

CUTLER & ASSOC

via Clerk's ECF noticing procedures

1477 CAMERON CT
HOFFMAN ESTATES, IL 60010

Please take notice that on October 24, 2019 at 10:00 am my designee or I will appear before the Honorable Judge DONALD R CASSLING at 219 South Dearborn Courtroom 619, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, Il 60603 or by the methods indicated on October 16, 2019.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On September 06, 2019 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend schedule G - remove lease; amend plan - #3.1 direct payment for Tidewater who is not in the plan and amend J - listed car maintenance twice - #12 and #21.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,
/s/ Tom Vaughn

TOM VAUGHN
CHAPTER 13 TRUSTEE
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(312) 294-5900